REMARKS

By this amendment, no claims have been amended, added, or cancelled. Hence, Claims 56-63 are pending in the application.

SUMMARY OF THE REJECTIONS

Claims 56-63 were rejected under 35 U.S.C. § 102(e) as allegedly being anticipated over U.S. Patent No. 6,300,947 issued to Kanevsky et al. ("*Kanevsky*").

Applicants respectfully traverse.

AN IDS HAS BEEN FILED WITHOUT ACKNOWLEDGEMENT

Applicants thank the Examiner for the copy of the initialed 1449 form acknowledging the IDS of November 9, 2004. Applicants respectfully note that they have not received an initialed 1449 form acknowledging the filing of an Information Disclosure Statement (IDS) on May 11, 2005 and on June 13, 2005. Applicants respectfully respect a copy of an initialed 1449 form to acknowledge the IDS of May 11, 2005 and of June 13, 2005.

EACH OF THE PENDING CLAIMS IS PATENTABLE OVER THE CITED ART

Each of Claims 56-63 feature one or more elements that are not disclosed, taught, or suggested by the cited art. For example, Claim 56 recites:

> "**receiving, at a mobile applications server, registration data from an application, wherein the registration data specifies rules about how mobile devices are allowed to interact with the application;**
> the mobile application server operating as an intermediary for interactions between the mobile device and the application; and
> **while operating as an intermediary, the mobile application server enforcing the rules about how mobile devices are allowed to interact with the**

application, wherein the application is relieved of the responsibility of enforcing the rules about how mobile devices are allowed to interact with the application."

At least the above-bolded elements are not disclosed, taught, or suggested by *Kanevsky*.

The approach of Claim 56 provides a framework for a mobile device to request and receive a service from an application. The application sends registration data, which specifies rules about how mobile devices are allowed to interact with the application, to a mobile applications server. Advantageously, the application does not need to be configured with knowledge of the capabilities of the mobile device, or how to communicate with the mobile device, because the mobile application server operates as an intermediary for interactions between the mobile device and the application. While operating as an intermediary, the mobile application server enforces the rules about how mobile devices are allowed to interact with the application. Thus, the application is relieved of the responsibility of enforcing the rules about how mobile devices are allowed to interact with the application.

Kanevsky teaches an approach for adapting the display of a web page, at a client, based on the presentation capabilities of the client. A client sends a request message that requests a web page identified by a URL to a server machine (Col. 6, lines 4-20). Simultaneously with the request message, the client sends a display mode message, which identifies several characteristics or parameters of the client's display, to the server machine (Col. 6, lines 21-28). A web page server adapter 107 transforms the requested web page to adapt the requested web page with the characteristics of the client's display identified in the display mode message (Col. 7, lines 24-40). The transformed requested web page is thereafter sent to the server 104, which sends the transformed requested web page onto the client machine 100 (Col. 7, lines 42-45).

There are several fundamental differences between the features of Claim 56 and the teachings of *Kanevsky*. Rather than discussing a mobile device that receives service from an

application, *Kanevsky* is directed towards transforming a requested web page, prior to transmittal to a client, in accordance with information, sent by the client, about the display capabilities of the client. Thus, no portion of *Kanevsky* teaches or suggests an application, which interacts with a client, that sends registration data to a mobile applications server. In fact, it is unclear what portion of *Kanevsky* the Office Action is asserting is analogous to an application. Further, there is no teaching in *Kanevsky* that is analogous to a mobile applications server enforcing the rules about how mobile devices are allowed to interact with an application.

In view of the fundamental differences between Claim 56 and *Kanevsky*, *Kanevsky* does not show numerous elements of Claim 56. To illustrate, Claim 56 features the element of "receiving, at a mobile applications server, registration data from an application, wherein the registration data specifies rules about how mobile devices are allowed to interact with the application." To show this element, the Office Action cites (a) the web page adaptor server 107 and (b) Col. 6, lines 20-27, which discusses a client sending a display mode message. The Office Action argues that receiving registration data is shown by the web page adapter server 107 receiving a requested web page from a web site. However, because a requested web page fails to meet the features of registration data as claimed, the Office Action simultaneously argues that registration data is shown by a display mode message sent by the client. This is a logical inconsistency, as the display mode message sent by the client and received by the server is separate and distinct from the requested web page obtained by the server from a web site.

Neither a requested web page nor the display mode message of *Kanevsky* satisfies the features of registration data as claimed. A requested web page does not specify rules about how mobile devices are allowed to interface with the application. Consequently, a requested web page cannot be analogous to registration data as claimed.

Similarly, a display mode message is not analogous to registration data as claimed because, rather than specifying rules about how mobile devices are allowed to interface with an application, a display mode message specifies characteristics or parameters of a client's display. Said differently, knowledge of the display capabilities of a client does not enable one to determine rules about **how mobile devices are allowed to interface with an application**. To the extent that the display mode message contains any rules, the rules contains in the display mode message only indicate rules about how other entities are to **interact with the client**. In sharp contrast, registration data specifies rules about how mobile devices are allowed to interact with an application. As a result, the element of "receiving, at a mobile applications server, registration data from an application, wherein the registration data specifies rules about how mobile devices are allowed to interact with the application" is not disclosed, taught, or suggested by *Kanevsky*.

Further, Claim 56 features the element of "while operating as an intermediary, the mobile application server enforcing the rules about how mobile devices are allowed to interact with the application, wherein the application is relieved of the responsibility of enforcing the rules about how mobile devices are allowed to interact with the application." The Office Action argues that the web adapter server 107 satisfies this element by transforming the requested web page to adapt the requested web page with the characteristics of the client's display identified in the display mode message. The position of the Office Action is that the web adapter server 107 is analogous to the mobile application server acting as an intermediary. Thus, to satisfy the features of Claim 56, the web adapter server 107 should "enforce the rules about how mobile devices are allowed to interact with the application" where the rules are specified in registration data sent by an application.

Instead of showing the claimed features of the mobile applications server, the web adapter server 107 transforms a web page, requested by the client, according to information, received from the client, about the display capabilities of the client. As a result, **the web adapter server 107 does not enforce any rules, supplied by an application, about how a mobile device is allowed to interact with the application**. Indeed, the web adapter server 107 cannot enforce any rules as claimed because the web adapter server 107 does not receive any data, from any entity, that specifies rules about how mobile devices are allowed to interact with that entity. Consequently, the element of "while operating as an intermediary, the mobile application server enforcing the rules about how mobile devices are allowed to interact with the application, wherein the application is relieved of the responsibility of enforcing the rules about how mobile devices are allowed to interact with the application" cannot be disclosed, taught, or suggested by *Kanevsky*.

In view of the above fundamental differences between the features of Claim 56 and *Kanevsky*, it is respectfully submitted that Claim 56 recites at least one element that is not disclosed, taught, or suggested by the cited art. Consequently, it is respectfully submitted that Claim 56 is patentable over the cited art and is in condition for allowance.

Claim 60 recites elements similar to that of Claim 56, except that Claim 60 is recited in machine-readable medium format. Consequently, for at least the reasons given above with respect to Claim 56, it is respectfully submitted that Claim 60 is patentable over the cited art and is in condition for allowance.

Claims 57-59 and 61-63 are dependent claims, each of which depends (directly or indirectly) on one of the claims discussed above. Each of Claims 57-59 and 61-63 is therefore allowable for the reasons given above for the claim on which it depends. In addition, each of Claims 57-59 and 61-63 introduces one or more additional limitations that independently

render it patentable. However, due to the fundamental differences already identified, to expedite the positive resolution of this case a separate discussion of those limitations is not included at this time, although the Applicants reserve the right to further point out the differences between the cited art and the novel features recited in the dependent claims.

CONCLUSION

For the reasons set forth above, it is respectfully submitted that all of the pending claims are now in condition for allowance. Therefore, the issuance of a formal Notice of Allowance is believed next in order, and that action is most earnestly solicited.

The Examiner is respectfully requested to contact the undersigned by telephone if it is believed that such contact would further the examination of the present application.

Please charge any shortages or credit any overages to Deposit Account No. 50-1302.

Respectfully submitted,
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CERTIFICATE OF MAILING

I hereby certify that this correspondence is being deposited with the United States Postal Service as first class mail in an envelope addressed to: **Mail Stop AF**, Commissioner for Patents, P. O. Box 1450, Alexandria, VA 22313-1450

on July 18, 2005 by Angelica Maloney
Angelica Maloney